

**Notice of Potential  
National Pollution Discharge Elimination System (NPDES)  
PERMIT VIOLATIONS**

Permittee (facility) Name and Address:

ROCKAWAY BEACH WASTE WATER TREATMENT FACILITY  
1000 BOYS CAMP ROAD.  
ROCKAWAY BEACH, MO 65740

NPDES Permit Number:

MO-0108162

During the Clean Water Act § 308 compliance inspection conducted on SEPTEMBER 11, 2007  
the potential NPDES permit violations noted below were found. Additional violations may be brought to  
your attention following a complete review of the inspection report and other available information.

**POTENTIAL NPDES PERMIT VIOLATIONS**

FAILED TO MAKE A SUBMITTAL OF THE YEAR 2006 SLUDGE  
REPORT AS REQUIRED BY STANDARD CONDITION, PART III,  
SECTION K(2)(a). THE REPORT WAS DUE JANUARY 28, 2007.

DETERMINATION OF BIOCHEMICAL OXYGEN DEMAND (BOD), TOTAL  
SUSPENDED SOLIDS (TSS), POTENTIAL HYDROGEN ION (PH), FECAL  
COLIFORM (FC), TOTAL PHOSPHORUS AS P (TP) AMMONIA AS N (NH<sub>3</sub>-N),  
AND OIL AND GREASE (O&G) WERE NOT BEING PERFORMED BY  
THE PLANT OPERATOR NOR BY A CONTRACT LABORATORY.

**REQUESTED ACTION:** Within ten (10) days, please describe in writing any actions taken, or planned, to  
correct the potential violations identified above. Your response will be considered in the determination of  
the need for further administrative or legal action. Mail your description of corrective actions to your  
inspector at:

U.S. Environmental Protection Agency  
ENSV/EMWC  
901 North 5<sup>th</sup> Street  
Kansas City, Kansas 66101-2907

Inspector's printed name:

JOSEPH E. JOSLIN JR.

Inspector's signature:

*Joseph E. Joslin Jr.*

Notice received by:  
(name & title)

LARRY CLINE, MAYOR

Date:

SEPT 13, 2007



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**POTENTIAL NPDES PERMIT VIOLATIONS**

THE TEST PROCEDURE EQUIPMENT AND METHOD AVAILABLE TO DETERMINE AMMONIA AS N AND TOTAL PHOSPHORUS AS P FAIL TO MEET THE REQUIREMENTS GIVEN IN 40 CFR 136. BOTH TEST PROCEDURES REQUIRE DIGESTION AS AN INITIAL STEP WHICH IS NOT DONE

PROCESS CONTROL TESTS GIVEN AS REQUIRED AS STATED IN 10 CSR 20, CHAPTER 9 ARE INCORPORATED INTO THE NPDES PERMIT BY REFERENCE. THESE TESTS ARE NOT PERFORMED AT THE SPECIFIED FREQUENCY.

SPECIAL CONDITIONS IN THE NPDES PERMIT, PART C(2), REQUIRES THAT THE OUTFALL BE CLEARLY MARKED IN THE FIELD. THE PRESENT MARKING DOES NOT IDENTIFY CLEARLY THAT AN OUTFALL EXISTS AND THE NATURE OF THE OUTFALL.

SPECIAL CONDITION IN THE NPDES PERMIT, PART C(8), REQUIRES SEMI-ANNUAL REPORTS BE SUBMITTED WITH THE APRIL & OCTOBER DMRS WHICH ADDRESS MEASURES TAKEN TO LOCATE AND ELIMINATE SOURCES OF INFLOW AND INFILTRATION INTO THE CITY'S COLLECTION SYSTEM. THESE REPORTS ARE NOT BEING PROVIDED TO MISSOURI DEPT OF NATURAL RESOURCES.

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LARRY CLINE, Mayor

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**POTENTIAL NPDES PERMIT VIOLATIONS**

FAILED TO MAINTAIN AND CALIBRATE THE FLOW MEASURING EQUIPMENT. THE EFFLUENT FLOW METER READS A CONSTANT FLOW AND HEAD REGARDLESS OF THE ACTUAL FLOW. THE ROCKAWAY BEACH INFLUENT FLOW METER READS A NEGATIVE HEAD AT ZERO FLOW. THE MERRIAM WOODS/ BULL CREEK VILLAGE HEAD SENSOR IS IMPROPERLY LOCATED FOR THE PARSHALL FLUME BEING USED.

FAILED TO MAINTAIN THE EAST AERATION TANK/CLARIFIER IN AN OPERABLE STAND BY CONDITION. THIS SYSTEM HAS NOT BEEN RUN IN MORE THAN THREE YEARS. PRESENT STATUS OF AVAILABILITY IS UNKNOWN.

- FAILED TO MAINTAIN THE RECORDS REQUIRED BY STANDARD CONDITIONS, PART I, SECTION A(5). NONE OF THE RECORDS REQUIRED BY THIS SECTION WERE BEING KEPT.

THE NPDES PERMIT REQUIRES COMPOSITE SAMPLES FOR BOD, TSS AND THE WET TEST. WHEN THESE SAMPLES ARE COLLECTED, ONLY A GRAB SAMPLE IS COLLECTED.

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